

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA :

v. : S17 07 Cr. 971 (RPP)

CHRISTOPHER MICHAEL COKE, :
a/k/a "Duddus," :
a/k/a "Shortman," :

Defendant. :

- - - - - x

DECLARATION IN CONNECTION WITH THE SENTENCING OF CHRISTOPHER
MICHAEL COKE, a/k/a "Duddus," a/k/a "Shortman"

I, Witness 2, hereby declare:

1. I am a citizen of Jamaica. I am submitting this Declaration as "Jane Doe," instead of in my true name, because I am afraid that my safety and that of my family would be at risk if my identity were revealed. I am also the author of the March 13, 2012 e-mail to the Honorable Robert P. Patterson regarding the sentencing of Christopher Michael Coke, which is attached as Exhibit A. Since sending that e-mail, I have met personally with agents of the Drug Enforcement Administration and prosecutors from the Southern District of New York who are handling this case.

2. I am currently pursuing a Master's degree at a major University located in Jamaica (the "University"). I have a Bachelor's degree in economics from the University. I have also taken graduate-level courses in statistics at a University in the United States. My study has focused on social issues such as

HIV/AIDS, homelessness and substance abuse.

3. I have studied various populations in Kingston, Jamaica. These studies have been conducted, among other means, by "person to person" surveys, in which I, along with other researchers referred to herein as "fieldworkers", approached individuals on the streets of Kingston and asked them questions, usually by reference to a questionnaire, about their personal circumstances.

4. In the course of my research, I have conducted surveys in areas of Kingston near Tivoli Gardens and in particular, the area between Church Street and Coronation Market (the "Market"). To conduct these surveys, I did not actually enter Tivoli Gardens, which was well-known to be a dangerous area. That area is and has been viewed by residents of Kingston, including me, as off-limits to ordinary Kingston residents as well as members of the Jamaican police, (the Jamaican Constabulary Force). Christopher Coke, members of the criminal Shower Posse Organization (the "Organization") which was run by Coke, and known members of the Jamaican Labor Party, with which Coke and his Organization were known to be affiliated, were allowed to enter Tivoli Gardens. Other individuals could enter Tivoli Gardens only if their entry was specifically authorized by Coke. Tivoli Gardens is marked with a "1" on a map of a portion of Kingston, Jamaica, that is attached hereto as Exhibit B; the

Denham Town area, which was also controlled by Coke, is marked with a "2."

5. I conducted these surveys in or around 2006, in the early morning hours. The majority of the people with whom I interacted for purposes of my research were either homeless or resided in Tivoli Gardens and the surrounding area. Persons I encountered in the Market, close to Tivoli Gardens, came from Tivoli Gardens and the surrounding areas. In addition to vendors, baggage handlers worked in the Market, assisting sellers and customers with the delivery of goods from the interior of the Market to the nearest available public transportation. In the course of my research I also spoke to vendors, baggage handlers and others who worked in the Market.

6. In or around 2006, Coke exercised complete control over the Tivoli Gardens community and the surrounding area. Many of the people that I spoke to told me that Coke "provided" for them. While they were speaking, their demeanor indicated to me that they were terrified of Coke and afraid even to speak his name. When they did speak of Coke, they spoke of him with great deference.

7. In the course of my research in 2006, I encountered a woman who was living on the street in the area near the intersection of Tower Street and King Street, within walking distance to Tivoli Gardens. That location is marked with a "6"

on the map attached as Exhibit B. I documented on a questionnaire the information that this woman provided to me. The woman said that she had attended college for two years in the United States. She told me that she had been deported from the United States after serving a sentence of approximately two years' imprisonment on a second-degree murder conviction. She reported that she was a home attendant who conspired to kill the person she was taking care of in the United States.

8. This woman, who was in her forties, told me that upon being deported to Jamaica, she had been taken to "Tivoli," where "they" asked her to transport drugs to the United States. Because she referenced "Tivoli," I understood her to be referring to "Tivoli Gardens," the area controlled by Coke. I understood "they" to be a reference to members of Coke's Organization. This woman informed me that when she refused to carry drugs to the United States, "they" repeatedly raped her. She said that she had HIV and that she was at that time living on the street in the area, and that she was being raped repeatedly. Her life was completely destroyed. I encouraged her to seek medical attention, but she did not. My last contact with her was in 2008 and I do not know what happened to her thereafter.

9. I spoke to another woman in or around 2008, in the course of my research, whom I understood was also involved with Coke and his Organization. This woman was approximately 36 years

old. She worked as a "higgler" - a term used to describe a vendor - selling clothing on Princess Street, approximately two Avenues away from Tivoli Gardens. Princess Street also appears on the map attached at Exhibit B. This woman admitted that she was carrying drugs abroad, and that she earned \$6,000 Jamaican dollars per week from that work. She said to me words to the effect of "you can't touch, me go ahead and write it down" which I understood to mean that she was transporting drugs for a powerful person who could protect her from law enforcement. In light of her candor and the fact that she was working in an area that I knew to be within Coke's control, I concluded that she was carrying drugs for the Organization.

10. I understood that Coronation Market (the "Market") was within Coke's sphere of influence. One early morning in 2006, I and other fieldworkers entered the Market. We came in from different entrances: I entered from the Southern entrance (marked with a "4" on the map attached as Exhibit B); others entered from the North (marked with a "3"). Police officers in plain clothes accompanied us during our research that morning, but they did not enter the Market with us. I noticed that some of the fieldworkers who came into the Market from the North appeared to have left the Market without an explanation. Shortly thereafter, one of the other fieldworkers told me that we needed to leave the Market immediately. We left through the Southern entrance.

Those fieldworkers who came in through the Northern entrance told me that they observed a dead body lying at the entrance, in plain view, which no one appeared to be seeking to remove. Because Coke controlled the Market area, I viewed the placing of a dead body in a public location, and the fact that no one was trying to remove it, as an indication that the body was placed there on Coke's orders, likely as a form of intimidation. When we met up with the plain clothes officers who were accompanying us, I reported the presence of the dead body and I was told that things like that happened routinely in the Market area.

11. I also understand that Coke collected a "tax" from many of the legitimate businesses in the immediate area. For example, the local taxi drivers, based in front of the Ward Theatre on North Parade Avenue, were required to pay a "tax" of \$500 Jamaican dollars to Coke's Organization. This area is marked with a "5" on the map attached as Exhibit B. The tax was collected twice per week, on Tuesday and Thursday. I became personal friends with one local taxi driver (the "Driver"). The Driver told me about this regular collection, which he said he had to give to "Shortman's boys." Though the Driver did not further identify the person to whom he had to pay the tax, because this area was within Coke's sphere of influence, I concluded that "Shortman's boys" were members of Coke's Organization. (I have since noted, based on my review of press

reports relating to the case against Coke in the United States, that "Shortman" is alleged to be an alias used by Christopher Michael Coke.)

12. In approximately 2008 or 2009, a friend of the Driver told me that the Driver had been killed. This friend explained that "they" came to collect the regular \$500 from the Driver, and when the Driver told them that he did not have the money, the Driver was shot by "them" right away. Although the friend did not tell me specifically, I understood that the friend had witnessed the murder of the Driver, whom I never saw again. I also understood that the people who had approached the Driver and killed him because he could not pay the tax were members of Coke's Organization.

13. This declaration does not include everything I know about Coke and his Organization. Furthermore, where I have referred to conversations that I had with others and information that I learned from them, I have not attempted to relate what was said verbatim, but only in substance.

Pursuant to 28 U.S.C. § 1746, I hereby declare under penalty of perjury that the foregoing is true and correct.

Executed on: May 23, 2012
New York, New York

Witness 2.
Witness 2

EXHIBIT A

0702971(RPP)

USA v CHRISTOPHER COKE

From: [REDACTED]
Sent: Tuesday, March 13, 2012 4:30 PM
To: [REDACTED]
Subject: RE SENTENCING OF CHRISTOPHER DUDUS COKE

Dear [REDACTED],

If this does not relate to you because we are not sure who the prosecutors are could you please please pass it on to the relevant persons I want to join in the call to have Christopher Coke put away for a very long time.

AS A CITIZEN OF JAMAICA

Christopher "Dudus" Coke needs to go to prison for as long as his sentence permits and longer if additional charges can be brought to bear on him. This will send a clear message to his co-conspirators in Jamaica who have long felt that they were untouchables and above the law. I ask that you place him in a super maximum security prison where he will benefit from long hours of solitude to consider his years of destroying people and families.

Based on his actions in this country Jamaica, he has felt that he has the divine right to plunder and amass wealth by inflicting pain on the Jamaican people.

My friend the hard working taxi driver was shot and killed in cold blood because he did not have the J\$500.00 (USD6.00) a day extortion money at the time they came to collect or the police officer killed in the line of duties and buried kneeling down as if in supplication to the Father.

Everybody owed him a living, the professional, the commercial trader had to pay him protection money when what they needed was to be protected from him.

It was his divine right to force women into relationships with his HIV positive cronies or to target women destroy their financial base and force them into narcotics trafficking, some dying, most ending up in prison with long sentences.

What about my divine right to be protected from innocent-faced demonic animals like him masquerading in human form.

What about my divine right to live, work, raise a family watch my grand-daughter grow up without the constant fear of his ruthless brutality on the streets of Kingston.

Even now there are still the shouts of Shower! Shower! on the streets of Kingston to verbalize support for his terror organization.

How many persons have disappeared without a trace, how many more will cringe at the sound of his name.

Please Judge Patterson not one day less and more if you can.

I would like to thank the United States for their assistance in bringing him to justice and ask that the help be continued to deal with the ones that are coming behind him because his organization is not yet broken and is regrouping under his brother-in-law.

God Bless you.

Sincerely,
[REDACTED]

EXHIBIT B

